

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES,
INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DECLARATION OF ROBERT C. GILL IN SUPPORT OF
DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION TO
EXCLUDE THE TESTIMONY OF W. TODD SCHOETTELKOTTE IN PART**

1. I am an attorney at Saul, Ewing, Arnstein & Lehr LLP, counsel for Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "CHG"). I was admitted *pro hac vice* in this matter on October 27, 2017.

2. Attached as **Exhibit 1** is a true and correct copy of certain excerpts from the Opening Expert Report of Stacy Friedman dated August 10, 2018.

3. Attached as **Exhibit 2** is a true and correct copy of certain excerpts from the Expert Report and Disclosure of Melissa A. Bennis dated August 10, 2018.

4. Attached as **Exhibit 3** is a true and correct copy of certain excerpts from a December 6, 2017 motion to compel hearing in this matter.

5. Attached as **Exhibit 4** is a true and correct copy of certain excerpts from the deposition of Paul Suggs dated June 8, 2018.

6. Attached as **Exhibit 5** is a true and correct copy of a document produced by VGT in discovery bearing bates numbers VGT0006922 – VGT0006924 and introduced at the deposition of Alan Roireau as Exhibit 241.

7. Attached as **Exhibit 6** is a true and correct copy of correspondence from Robert Gill to Gary Rubman dated September 2, 2018.

8. Attached as **Exhibit 7** is a true and correct copy of a certain excerpt from Litigation Services Handbook, The Role of the Financial Expert (5th ed.).

9. Attached as **Exhibit 8** is a true and correct copy of certain excerpts from the Reply Expert Report and Disclosure of Melissa A. Bennis dated September 14, 2018.

10. Attached as **Exhibit 9** is a true and correct copy of certain excerpts from the deposition of W. Todd Schoettelkotte dated September 22, 2018.

11. Attached as **Exhibit 10** is a true and correct copy of a document produced by VGT in discovery bearing bates numbers VGT0052719 – VGT0052787.

12. Attached as **Exhibit 11** is a true and correct copy of a document produced by VGT in discovery bearing bates numbers VGT0053036 – VGT0053095.

13. Attached as **Exhibit 12** is a true and correct copy of a document produced by VGT in discovery bearing bates numbers VGT0030969 – VGT0031012.

14. Attached as **Exhibit 13** is a true and correct copy of the Rebuttal Expert Report of W. Todd Schoettelkotte Relating to Damages dated August 31, 2018.

15. Attached as **Exhibit 14** is a true and correct copy of certain excerpts from the International Financial Reporting Standard 3.

16. Attached as **Exhibit 15** is a true and correct copy of a certain excerpt from Gary R. Trugman, Understanding Business Valuation (2d ed. 2002).

17. I declare under penalty of perjury that the foregoing is true and correct.
Executed on November 16, 2018 in Washington, District of Columbia.

/s/ Robert C. Gill
Robert C. Gill

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November, 2018, I caused an unredacted copy of the foregoing Declaration to be served on the following counsel for Plaintiff who have consented to email service, via email:

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/s/ Robert C. Gill

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